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Presentment Date: March 14, 2011
Time: 12:00 (noon) (Eastern)

Objections Due: March 11, 2001
Time: 12:00 (noon) (Eastern)

Former Counsel to individual Debtor, Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff, v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation (Substantively
Consolidated)

MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR

Dickstein Shapiro LLP ("Dickstein") respectfully moves this Court pursuant to Local Rule 2090-1(e) to be removed as counsel of record to the above-captioned individual Debtor, Bernard L. Madoff.

In connection with our firm's prior representation of Mr. Madoff in his criminal case, Dickstein made a limited appearance in the involuntary bankruptcy case that is part of this consolidated bankruptcy proceeding. The attorneys at Dickstein who had represented Mr. Madoff in the criminal proceedings recently left the firm. When representatives of our firm contacted them at their new firm to substitute as counsel, they informed us that they no longer

represent Debtor and we should simply withdraw our appearance. Accordingly, Dickstein is seeking to withdraw as counsel.

Dated: March 7, 2011

Respectfully submitted,

/s/ Brian E. Goldberg_____

Brian E. Goldberg

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